

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

**IN RE NIELSEN HOLDINGS PLC
SECURITIES LITIGATION**

Civil Action No. 1:18-cv-07143-JMF

ORAL ARGUMENT REQUESTED

**NOTICE OF MOTION TO DISMISS
THE SECOND AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the Declaration of Craig S. Waldman, Esq., dated November 26, 2019, and the exhibits attached thereto, and the Declaration of Benjamin S. Hayes, dated September 5, 2019, Defendants Nielsen Holdings plc, Dwight Mitchell Barns, Jamere Jackson, and Kelly Abcarian (collectively, the “Defendants”), by and through their undersigned attorneys, will move this Court, before the Honorable Jesse M. Furman, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, on a date and time to be set by the Court, for an Order dismissing Plaintiffs’ Second Amended Complaint pursuant to the Private Securities Litigation Reform Act of 1995 and Federal Rules of Civil Procedure 9(b) and 12(b)(6).

Dated: November 26, 2019
New York, New York

/s/ Paul C. Curnin

Paul C. Curnin
Craig S. Waldman
Tyler A. Anger
SIMPSON THACHER & BARTLETT LLP
425 Lexington Avenue
New York, NY 10017
Tel.: 212-455-2000
Fax: 212-455-2502

*Attorneys for Defendants Nielsen Holdings
plc, Dwight Mitchell Barns, Jamere Jackson,
and Kelly Abcarian*